

USE, S.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

REUVEN LAPIN, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

QIAO XING UNIVERSAL TELEPHONE
INC., RUI LIN WU, AND ALBERT
LEUNG,

Defendants.

No. 07-cv-07829 (DLC) (HBP)

ECF CASE

USDC SDNY
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DOC #:
DATE FILED: 9/21/07

STIPULATION AND PROPOSED ORDER

IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties herein, that:

(a) Andrew N. Bernstein is authorized to accept service on behalf of defendants Qiao Xing Universal Telephone Inc. ("Qiao Xing"), and Rui Lin Wu, but not on behalf of Albert Leung, and does accept service of the summons and complaint in this action on behalf of Qiao Xing and Rui Lin Wu pursuant to Rule 4 of the Federal Rules of Civil Procedure without prejudice and without waiver of any defenses they may have, except as to sufficiency of service of process;

(b) Albert Leung retains all defenses and/or objections to this action or to the jurisdiction or venue of the Court;

(c) after the court enters an order consolidating this action with any related securities class actions, appointing lead plaintiff and lead plaintiff's counsel, defendants' counsel will confer with the court-appointed lead counsel regarding the schedule for the filing of a consolidated amended complaint, and for the filing of defendants' response to that complaint.

Defendants will not be required to answer or otherwise respond to the complaint filed on September 5, 2007 in this matter.

Dated: New York, New York
September 19, 2007

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Attorneys for Plaintiff

SO ORDERED: 

U.S.D.J.

Sept 21, 2007 